

RECEIVED & FILED
CLERK'S OFFICE
SEP 11 2024
AM 1 2 3 4 5 6 7 8 9 10 11 12 PM
AM 1 2 3 4 5 6 7 8 9 10 11 12 PM
US DISTRICT COURT
SAN JUAN, PR

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.
(1) SHAJONI HUGGINS,
(2) SHAKOI TITLEY,

Defendants.

INDICTMENTCRIMINAL NO. 24-3457 (APDQ)

VIOLATIONS:
8 U.S.C. § 1324(a)(1)(A)(ii)
8 U.S.C. § 1325(a)
(THREE COUNTS)

THE GRAND JURY CHARGES:

COUNT ONETransporting Illegal Aliens(Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (a)(1)(B)(i))

On or about August 25, 2024, in the District of Puerto Rico, within the jurisdiction of this Court, the defendants,

(1) SHAJONI HUGGINS,
(2) SHAKOI TITLEY,

knowingly or in reckless disregard of the fact that at least one alien, namely, P.R., C.L. and others, had come to, entered, or remained in the United States in violation of law, did, aiding and abetting each other, transport or move said alien within the United States by means of transportation or otherwise, in furtherance of such violation of law, for the purpose of commercial advantage or private financial gain. All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), (v)(II), and (a)(1)(B)(i).

COUNT TWO
Improper Entry by Alien
(Title 8, United States Code, Sections 1325(a))

On or about August 25, 2024, in the District of Puerto Rico and within the jurisdiction of this Court, the defendant,

(1) SHAJONI HUGGINS,

who is an alien, as the term is defined in Title 8, *United States Code*, Section 1101(a)(3), knowingly entered and attempted to enter the United States, at any time or place other than as designated by immigration officers. All in violation of Title 8, United States Code, Sections 1325(a).

COUNT THREE
Improper Entry by Alien
(Title 8, United States Code, Sections 1325(a))

On or about August 25, 2024, in the District of Puerto Rico and within the jurisdiction of this Court, the defendant,

(2) SHAKOI TITLEY,

who is an alien, as the term is defined in Title 8, *United States Code*, Section 1101(a)(3), knowingly entered and attempted to enter the United States, at any time or place other than as designated by immigration officers. All in violation of Title 8, United States Code, Sections 1325(a).

W. STEPHEN MULDROW
United States Attorney

Jenifer Y. Hernandez-Vega
Assistant United States Attorney
Chief, Child Exploitation and Immigration Unit

TRUE BILL

Foreperson
Dated: 9-11-2024